From:	Leaphart, Marion "Mel"
To:	Kuo, Mary
Cc:	Mitchell, Mike; Hesterlee, Craig; John Poole; Stewart, Jill C.; Clark, Ann
Subject:	Re: SC"s Industrial General Permit (SCR000000)
Date:	Friday, January 28, 2022 2:30:47 PM
Attachments:	Outlook-1469116743.png

Mary

Good talking to you on the 26th. It is always a pleasure to discuss Industrial Stormwater with those of a high level of understanding.

We discussed your comments in the call but I am responding in writing as promised.

On the lack of an aluminum benchmark in the permit, South Carolina does not have a water quality standard for aluminum. While it is understood benchmarks and water quality standards are not interchangeable, the development of a benchmark value is dependent on water quality data. Much like what we did in the 2011 IGP, those benchmarks listed in the then current MSGP that didn't have a corresponding water quality standard in South Carolina were removed. Those parameters included iron, manganese, and magnesium in addition to aluminum.

For the suggestions on AIM and indicator parameter monitoring, we will certainly keep them in mind for future iterations of the IGP. As I noted in our call, we did adopt the mid-term reset in the benchmark monitoring schedule and the revised benchmark values for cadmium, selenium, and silver.

When we drafted the 2011 IGP, it was South Carolina's first attempt at the multi-Sector approach to Industrial Stormwater and it was a significant shift in our permitting approach compared to what we had done the previous 20 years. The creation, outreach, education and compliance efforts of that permit were arduous for all involved. In learning from that experience we have taken a measured stance towards evolving the IGP. I have personally termed it "incremental progress." We believe it results in better compliance as smaller changes are easier to digest thereby resulting in greater understanding of the IGP by the regulated community.

I also mentioned in our call South Carolina's transition from EFIS to ePermitting as the fundamental software we use for permitting, inspections, compliance and enforcement. Transitions in any software are difficult but those in fundamental software are laborious and time-consuming as well. To add the AIM and indicator parameter monitoring development at this juncture is too much given the lead times required to develop the existing Industrial Stormwater elements. Simply put, it is bad timing given the resources available.

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From: Kuo, Mary <Kuo.Mary@epa.gov>
Sent: Monday, January 10, 2022 3:49 PM
To: Leaphart, Marion "Mel" <LEAPHAME@dhec.sc.gov>
Cc: Mitchell, Mike <Mitchell.Michael@epa.gov>; Hesterlee, Craig <Hesterlee.Craig@epa.gov>
Subject: SC's Industrial General Permit (SCR000000)

Good afternoon,

Thank you for sharing a preliminary draft of SCDEHC's general permit for industrial activity. EPA has looked through the draft permit, and we have a few questions/comments:

- Certain sector-specific benchmark monitoring did not include aluminum. Could you explain the why aluminum was left out?
- We recognize that the Additional Implementation Measures (AIM) that were added to EPA's 2021 MSGP was a significant change. We are curious why SCDEHC did not include such response procedures and if there is consideration for incorporating them in a later permit cycle.
- Similarly, we suggest that SC consider adding indicator monitoring requirements in a future permit cycle.

Also, you had asked a question about substantially-identical outfalls and whether that is an option for monitoring purposes for impaired waters with and without an approved TMDL. We consulted with EPA HQ, and they agreed that it is okay to only monitor at one discharge point if the others are substantially identical for impaired waters monitoring (see part 4.2.5.1.i below).

Part 4.2.5.1 **Facilities Required to Monitor Stormwater Discharges to Impaired Waters**:

> i. Year one of permit coverage: You must take your first annual sample in your first year of permit coverage, which begins in the first full quarter following May 30, 2021 or your date of discharge authorization, whichever date comes later. You must monitor for all pollutants causing impairments using a standard analytical method, provided one exists (see 40 CFR Part 136), once at each discharge point (except substantially identical discharge points)

discharging stormwater to impaired waters without an EPA-approved or established TMDL.

The only exception for the SIDP monitoring is if the discharge point is subject to effluent limitations, in which case the facility needs to monitor each discharge point (see part 4.1.1. pasted below). The same should apply whether or not there is an established TMDL unless the region could find a reason why the facility would need to monitor both discharge points.

> **Part 4.1.1 Monitored Stormwater Discharge Points.** Applicable monitoring requirements apply to each discharge point authorized by this permit, except as otherwise exempt from monitoring as a "substantially identical discharge point" (SIDP). If your facility has two or more discharge points that you believe discharge substantially identical stormwater effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the discharge points and report that the results also apply to the SIDP(s). As required in Part 6.2.5.3, your SWPPP must identify each discharge point authorized by this permit and describe the rationale for any SIDP determinations. The allowance for monitoring only one of the SIDP is not applicable to any discharge points with numeric effluent limitations. You are required to monitor each discharge point covered by a numeric effluent limit as identified in Part 4.2.2.

Let me know if you have any questions. Thank you, Mary

Mary Kuo
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NPDES Permitting Section
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